Appendix N
Responses to Comments

N COMMENTS AND RESPONSES

N.1 FORT ORD BASE REALIGNMENT AND CLOSURE (BRAC) OFFICE, 12 APRIL 2006

Comment 1: p.4-6, Sec. 4.5 Latrines. If Phase 2 work did not involve any of the latrines previously identified during Phase 1, this discussion does not belong to Chapter 4, Phase 2 Field Work.

Response: The information has been moved to a discussion in Section 2.2.5 of work not completed under Phase 2.

Comment 2: p.5-1, Sec.5.3.2. It's still unclear what happened to the 56 digital geophysical polygons. In the next section, it says Appendix H lists each of the 631 anomalies (incl. 56 polygons) and shown them on maps. But it appears that at least some of the polygons are not listed – for example on Map H-3, two polygons are shown (#0006 in Grid C2C8B3 and #0010 in Grid C2C8A5). But I did not find the intrusive investigation results for these two locations listed in the table in Appendix H. Please check the list.

Response: The following explanatory text now appears in Section 5.3.2 of the draft final: "In some cases, a polygon anomaly investigation could not be completed because an obstruction interfered with geophysical instruments, resulting in an SCA. If the UXO technicians found any sources (MEC, munitions debris, or RRD) before such interference put the area out of scope, the results were entered into the database and appear in Appendix H. If no sources were found before proximity to the obstruction interfered with instrument operation, then there was no information to enter into the database, and therefore no entry in Appendix H." The latter situation applies to polygon #0006 in Grid C2C8B3 and polygon #0010 in Grid C2C8A5.

Comment 3: p.10-4, Sec.10.3.2. The NTCRA at MOCO.2 was done thoroughly in 2 phases and using two detection technologies. Except for the grids that did not completely pass QC/QA, why would you recommend construction support for the entire site? Please reconsider this recommendation and if it should remain, please provide rationale. Please keep in mind that the site work will be evaluated under the MR RI'FS program which would evaluate the long-term remedy (the long-term remedy could be no further action, additional physical removal action or some type of land use controls, but specific alternatives will be evaluated in an RIFS).

Response: Section 10.3.2 in the draft final now reads "Reasonable and prudent precautions should be taken when intrusive operations are conducted in the MRS-MOCO.2 NOI removal area because the complete removal of MEC from any given area cannot be guaranteed. In addition, construction support should be provided during intrusive operations in the grids containing non-resolved SCAs, and all personnel involved with intrusive operations throughout the MRS-MOCO.2 NOI removal area should receive MEC recognition training. The MRS-MOCO.2 NOI removal area will be evaluated at a later date in the Fort Ord Munitions Response Remedial Investigation / Feasibility Study."

Comment 4: Map 6. The grid containing one of the three latrines (C2B8E5) is shown as QA accepted. This contradicts the information provided in the text of the report. Please resolve discrepancy. Grid C2B8I4 is shown as "Construction Support" but the reason for not completing QA for this grid was not explained in the text. Please verify. Lastly, this map is titled "QA Grid Acceptance Status" – therefore the category named "Construction Support" is inappropriate. Shouldn't it be "TBD"?

Response: The text has been corrected to show that one latrine was within grids C2B8J4 and C2B8I4 and the other was in C2B8F5. Although Map 6 in the draft appears to show the latrine in C2B8F5 as if it were also in C2B8E5, in reality it did not interfere with operations in C2B8E5. Map 6 in the draft final has adjusted the symbol size/location to avoid this confusion. The category called "Construction Support" in the draft is called "TBD" in the draft final for consistency with the map's purpose of showing grid acceptance status.

N.2 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, 12 APRIL 2006

General Comments

Comment: The Title of the document would better reflect the action performed if it distinguished the area which was subject to the Non Time Critical Removal Action (NTCRA) from the southern portion of MRS-MOCO.2 designated which did not receive any clearance activity under the NTCRA. Provide explanatory text in Chapter 1 or 2 which address the actions planned for the southern 26 acres of MRS-MOCO.2.

Response: The title of the AAR now refers to the area of interest as the *MRS-MOCO.2 NOI Area* to distinguish those 33 acres identified by the notice of intent for separate action from the lower 26 acres (which were subject to action under the MRS-Ranges 43-48 interim action and are therefore not included in this report).

Section 2.2.2.1 of the draft included the following explanation: "The removal of MEC at MRS-MOCO.2 was originally planned as part of the MRS-Ranges 43-48 interim action, which required a detailed evaluation of vegetation clearance alternatives. As a result of regulatory agency and public review, the 33-acre northern portion of MRS-MOCO.2 identified by the NOI was excluded from the process because (1) its vegetation could be cut and (2) it is proposed for future development. The site boundary and the parcel boundary were later modified to delineate the 33-acre development area that was subject to the MRS-MOCO.2 NTCRA; the rest of the 59 acres (including the Range 45 firing positions and most of the Range 45 pad) was assigned to the MRS-Ranges 43-48 interim action.

To supplement that explanation, the draft final now adds the following sentence: "Results of the MRS-Ranges 43-48 interim action, including the work on the southern 26 acres of MOCO.2 not included in the NOI, are in the MRS-Ranges 43-48 Interim Action Technical Information Paper scheduled for completion in July 2006."

Specific Comments

Comment 1: Table 2-1, Special Case Area Features, Page 2-5: The footnote at the bottom of the table reads, "Note: Missing ID numbers correspond to items that were removed from the scope of work." No explanation is provided here or elsewhere in the document as to why the missing items were removed from the scope of work (SOW), nor is an explanation as to what these items consisted of proffered. Please provide the identification of the items removed from the SOW and the reason for their removal at an appropriate place in Chapter 2.

Response: The text before Table 2-1 now describes the SCAs that were not completed under Phase 2 and explains their disposition. The revised footnote refers readers to this text.

Comment 2: Section 4.2, Processing Areas, Page 4-3: Clarify the text regarding where the concrete pad that was used for processing heavy targets from Ranges 43-48 was located. Based on Map 2, there does not appear to be a concrete pad within the area designated as Range 44. Also, the text reference to concrete pads and SCA does not correlate with Map 3(Map indicates SCA-31 is a steel culvert and SCA-30 is north of, and outside of Range 44).

Response: The pads are not on the firing ranges *per se*, but are near their associated ranges; they are the areas (usually paved) where troops using the range parked and/or met, and were located behind the range firing line for safety reasons. The area indicated on Map 3 as SCA 31 was the Range 44 pad, while the smaller area indicated as SCA 30 was known as the Range 44A pad. Both were used during MEC removal activities at the former Fort Ord to process heavy targets from the Impact Area before performing the MOCO.2 NTCRA. The appearance of the locator symbol for SCA 31 on Map 3 has been changed to avoid confusion with culverts.

Comment 3: Section 5.3.2, Reacquisition, Page 5-1: This section of the Draft Non-Time Critical Removal Action, MRS-MOCO.2 (Phases 1 and 2) After Action Report (hereinafter referred to as the Draft MRS-MOCO.2 NTCRA AAR) notes that, "Of the 631 anomalies, 508 were successfully reacquired." No information is provided detailing the probable reasons that 123 of the previously detected anomalies (approximately 20 % of the total detected) were not reacquired. Please provide a discussion as to why these anomalies were not reacquired. Also, please state whether this percentage of non-reacquisitions is within the normal range experienced at the former Fort Ord and elsewhere using similar equipment.

Response: Section 5.3.2 now explains why the anomalies were not reacquired and that this percentage falls within the normal range at Fort Ord: "Of the 631 anomalies, 508 were successfully reacquired, including all 56 digital geophysical polygon anomalies. The reacquisition teams found no anomaly meeting the 3-mV anomaly selection threshold at the remaining 123 anomalies. Most of these anomalies were likely background noise recorded during the initial survey. This rate is typical at Fort Ord when using a threshold just above the background noise level. Excavation teams investigated 45 of the 123 unsuccessfully reacquired anomalies as a quality control measure for the reacquisition process; the investigations found no MEC or expended munitions debris."

Comment 4: Section 6.2.1, Reacquisition and Intrusive Investigation Results, Page 6-2: The second paragraph of this section indicates that, "Three grids containing utility poles and pole anchors (Photograph 14) were assigned TBD or "construction support" status…" This number is confirmed in the third paragraph of Section 6.3. However, a review of Map 6 in Appendix A shows six grids identified as requiring construction support. A check of the remainder of the document did not locate any further recommendations for construction support involving an additional three grids. Please review the Draft MRS-MOCO.2 NTCRA AAR and all attached appendices and determine the correct number of grids that should be identified as requiring construction support. Please ensure that this correct number is reflected on the cited map and in the narrative portions of the report.

In addition, the first paragraph of Section 6.2.1 refers to the excavation of 58 anomalies, but the second paragraph states there were 34 anomaly excavations. Please revise the cited paragraph to explain this difference or correct the numbers as necessary.

Response: The two latrines inspected and backfilled during the Debris Pile Removal at MRS-MOCO.2 SOW (one on grid C2B8F5 and the other straddling grids C2B8J4 and C2B8I4) were also assigned TBD / construction support status. The draft final version in Sections 2.2.5 and 6.2.1 specifies this status for the three grids containing the two latrines.

The typo that read 34 anomaly excavations has been corrected to read 58 anomaly excavations.

Comment 5: Section 8.1, Phase 1, Page 8-1: This section states that, "Also, if backhoe excavations are necessary at a location but cannot be completed before digital mapping, the location should be recorded using GPS to prevent selecting anomalies from there for reacquisition, since the anomalies will be excavated by backhoe." It is unclear as to exactly what is intended by this statement. It is also unclear as to why backhoe excavation disqualifies the anomalies from reacquisition. Please revise this sentence and, if necessary, expand the subject matter to clarify the intent of the sentence. Also, please explain the anomaly disqualification from reacquisition selection due to backhoe use.

In addition, the last sentence in the section indicates that, "The non-recovery of two QA seed items, steel bars simulating 37mm projectiles, was attributed to one of the items not having an anomalous response and the other having a profile smaller than a 37mm projectile." It is unclear what the phrase "not having an anomalous response" indicated. Please expand this section to further explain what "not having an anomalous response" means and why this may have occurred.

Response: Section 8.1 in the draft final has been revised to explain that "if anomaly density or depth at a location requires backhoe excavations that cannot be completed before digital mapping, the location should be recorded using GPS to prevent using digital mapping to select anomalies from there for reacquisition, since the anomalies will be excavated when the backhoe excavates that area, and attempting to perform digital excavation in that location would be redundant and inefficient.

The text in Section 10.1.1.2 that read “The non-recovery of two QA seed items, steel bars simulating 37mm projectiles, was attributed to one of the items not having an anomalous response and the other having a profile smaller than a 37mm projectile” has been revised to read “Two QA seed items representing 37mm projectiles, a small steel bar and a section of threaded rod, were not recovered. The small steel bar was significantly smaller in diameter than 37mm. The threaded rod was tested after the survey by placing it next to an EM61-MK2 and did not produce an anomalous response; that is, the instrument did not detect its presence, likely due to the rod’s manufacturing process. This makes the threaded rod unrepresentative of the 37mm projectile it was intended to simulate.”

Comment 6: Section 10.1, Summary, Conclusions, and Recommendations, Page 10-1, Bullet 2): The bullet states that “any” anomalies detected were investigated and resolved. This is a broader statement than the actual work performed. It would be more appropriate to state that all anomalies were investigated, but only 508 were resolved. (See section 5.3.2)." See comment on Section 5.3.2.

Response: As the draft final now states in 5.3.2, all 631 anomalies were resolved: 508 were reacquired and the remaining 123 were found by reacquisition teams to be below the 3-mV anomaly selection threshold.

Comment 7: Section 10.1.1.2, Digital Mapping, Page 10-2: The last paragraph of this section presents a somewhat limited recapitulation of the Phase 1 Quality Control (QC) and Quality Assurance (QA) seeded items recovery results. However, the numbers presented do not seem to correlate well with those found in Appendix B, Section 4.3.4, Recovery of Seeded Items. Please review the two cited sections and correct them as necessary.

Response: AAR Section 10.1.1.2 – Digital Mapping summarizes QC/QA for Phase 1 *digital mapping activities* only. Appendix B of the AAR reproduces the Phase 1 TIP Section 4.3.4 – Recovery of Seeded Items (in Section 4.3 – Analog Removal Results), which discusses QC/QA for Phase 1 *analog removal activities* only. The numbers differ because the items seeded were not identical for the digital mapping activities discussed in AAR 10.1.1.2 and for the analog removal activities discussed in TIP 4.3.4. However, in AAR Section 1.1.1.1 – Analog Removal, the numbers in the paragraph that summarizes QC/QA correlate exactly with the numbers in Phase 1 TIP Section 4.3.4.

Comment 8: Section 10.1.1.3.3, QC-3, Page 10-2: The second paragraph of this section, referring to Phase 1 results, notes that, “The other 96 grids contained SCA’s, which were addressed in Phase 2.” However, Section 6.2 QC-2: Digital Quality Assurance records the number of grids involved in Phase 2 as 102. Please identify the source of the additional grids and the reason for their inclusion in Phase 2 of the NTCRA.

Response: The second paragraph of section 6.2 in the draft final now explains that QC-2 was performed in the 96 grids that were accepted following Phase 2 work and also in the six grids receiving TBD status due to the presence of latrine pits or utility poles that could not be removed within the time and funding constraints of the SOW.

Comment 9: Map 3: The legend symbols are not consistent with the text or some of the symbols on the map, for example steel pipes are designated by a blue dot, but the legend does not contain a symbol for steel pipe. Suggest using the SCA Categories in Table 2-1 for the legend description in Map 3. Recheck the descriptions between Table 2-1 and Map 3 as there are some which do not appear consistent (SCA 11, 12, 14).

Response: The Map 3 legend in the draft final now uses the same categories as those in Table 2-1. The color codes for the pointers in the draft final now match with the categories in Table 2-1, and SCAs 11, 12, and 14 on the map now match with their categories in Table 2-1 (Asphalt and Concrete Features; Asphalt and Concrete Features; and Culverts, Pipes, and Buried Steel; respectively).

Comment 10: Appendix M, Ordnance and Explosive QA Memo, dated July 21, 2005: The text of this memo has been edited from 8 grids to 9 grids which underwent a 10% QA. However, the grids listed in the memo indicate there were 8 grids. Check to ensure the text is accurate.

Response: Eight grids underwent a 10% QA. Who mistakenly handwrote a 9 is unknown, as is that person's reasoning for the change. The appendix reproduces the memos as they exist.

N.3 ENVIRONMENTAL STEWARDSHIP CONCEPTS ON BEHALF OF THE FORT ORD ENVIRONMENTAL JUSTICE NETWORK, RECEIVED 14 APRIL 2006

General Comments

Comment 1: The report offers no specifics about the nature of MEC or unexploded ordnance (UXO) found during removal actions. The main report should contain at a minimum a table outlining these findings, as they are a critical component of the after action report. The report in its current form focuses more on other actions such as the removal of fencing and Quality Assurance /Quality Control concerns. Community members have a right to know the specific nature of removed MEC, and it is unacceptable for the after-action report of a removal to not include this data.

Response: The text in the AAR primarily covers previously unreported work at MRS-MOCO.2 (i.e., the Phase 2 removal actions in the SCAs), including specifics about all four MEC items encountered during Phase 2. The AAR summarizes the *Technical Information Paper, Non-Time Critical Removal Action, MRS-MOCO.2 (Phase 1), June 2004* in Section 2.2.4 and in various places refers readers to that Phase 1 TIP for previously reported information about removal work at the site, including specific information about MEC found during the Phase 1 actions. Appendix B of the AAR (on the CD included with the Phase 2 AAR draft) reproduces that Phase 1 technical information paper.

Chapter 5 in Sections 5.1 and 5.2 of the AAR draft discussed the four MEC encountered during Phase 2 (one M74 series airburst projectile simulator during site preparation; one M74 series airburst projectile simulator and two M744 22mm subcaliber practice projectiles during analog removal). Chapter 5 in the draft also referred readers to

Appendix G for the database report on these MEC items encountered during Phase 2 and to Map 5 to see the location of the four MEC items encountered during Phase 2. This draft final also includes the text, database report, and map as in the draft, and adds to Sections 5.1 and 5.2, respectively, tables of MEC encountered during Phase 2 site preparation and during Phase 2 analog removal. No such table is included for Section 5.3 because no MEC items were encountered during digital geophysical activities.

Comment 2: ESC agrees with the Army's recommendation that precautions should be taken during future intrusive actions at the site. However, this should not just be limited just to the immediate future, and we suggest that the Army expand this recommendation to state that institutional controls continue at the site even after the property is transferred from the Army's control.

Response: The MRS-MOCO.2 site will be re-evaluated under the Fort Ord Munitions Response Remedial Investigation / Feasibility Study to assess the munitions response completed, remaining potential risks, and long-term risk management of the site. The need for land use controls for the site would be evaluated under that process.

Specific Comments

Comment 1: Page vii, Acronyms and Abbreviations: This section should include the MOCO acronym. It is not stated in the report what this particular designation means.

Response: MOCO.2 is parcel 2 in Monterey County; this draft final defines the acronym.

Comment 2: Table 2-1, Special Case Area Features, Page 2-5: The Army needs to define the Special Case Area Categories before this table is presented. It's current placement combined with the line on page 2-4 "The SCAs were categorized as fence, asphalt, latrine, berm, and asbestos pipe" may lead readers to believe that asbestos piping was present across the entire site which is not the case.

Response: The draft final now presents the SCA categories used during Phase 2 operations shortly before Table 2-1.

Comment 3: Appendix A, Map 3: This map needs an additional item in the legend to describe the white circles with numbers in them. It is assumed that these are the locations of special case areas but this is not immediately clear to the reader.

Response: The Map 3 legend now includes the symbol identifying the SCA locations. The numbers in the circles correspond to the SCA IDs in Table 2-1.

From the FOEJN Cover Letter

Comment: Since this site is located near our elementary schools and housing areas, Schools and housing areas, how deep was the depth of removal? We would like to know what was removed and how much. What institutional controls are or will be in place. Where is location of asbestos piping and how much piping are we dealing with?

Response: As specified in Sections 1.1, 2.2.4.2, and 3.2 and in Chapter 4, removal was to depth; that is, digging continued until the anomaly source was removed.

Chapter 5 – Phase 2 Results discussed items encountered and removed during Phase 2, including description and numbers of all MEC items. MEC items recovered during the Phase 1 operations were previously reported in *Technical Information Paper, Non-Time Critical Removal Action, MRS-MOCO.2 (Phase 1), June 2004.* This report is provided on the CD included in the Phase 2 AAR.

The potential need for and types of land use controls would be evaluated in the Fort Ord Munitions Response Remedial Investigation and Feasibility Study for this site at a later date.

Section 1.2 of the AAR draft explained that transite (asbestos-containing) pipe was found only at Ranges 44 and 45. As mentioned in Section 4.7 of the draft (Section 4.6 of the draft final), the transite pipe was removed before Phase 2 activities began. The *Final MRS-Ranges 43-48 and MRS-MOCO.2 Technical Information Paper, Range-Related Debris Removal, March 2005* provides more information about the disposal of these pipes; the draft final of the AAR now refers readers to this document. The draft final also explains that in addition to the transite pipes, approximately one cubic foot of asbestos-containing material was removed from the site and disposed in the Kettleman Hills Landfill in Kings County, CA.